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March 14, 2024


The request is GRANTED. Plaintiff shall submit his motion for default judgment by April 15, 2024. The initial pre-trial conference scheduled for April 3, 2024 is adjourned without date.

SO ORDERED.

VIA ECF

Hon. Jennifer L. Rochon, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Dated: March 14, 2024
New York, New York


JENNIFER L. ROCHON
United States District Judge

Re: *David McGlynn v. Universal Creative Group, Inc.*
Case No. 1:23-cv-11085-JLR

Dear Judge Rochon:

We represent plaintiff David McGlynn (“*Plaintiff*”) in the above-captioned action. Pursuant to Paragraphs 1(A) and 1(F) of Your Honor’s Individual Practices, Plaintiff respectfully moves this Court for a thirty (30) day extension of time until and including April 15, 2024, for Plaintiff to file its motion for default judgment against Universal Creative Group, Inc (“*Defendant*”).

In support of this Motion, Plaintiff includes the following:

- (1) the deadline for Plaintiff to submit its motion for default judgement is March 16, 2024, via Your Honor’s February 16, 2024, Order (*Dkt. No. 17*);
- (2) this is Plaintiff’s first request for an extension of time;
- (3) good cause exists for Plaintiff’s request as, given the Court’s preferred and general interest in resolving matters on the merits, Plaintiff has undertaken efforts to notify Defendant of the pendency of the instant action by which Plaintiff respectfully requests additional time in which to continue its efforts so as to entice Defendant to respond and/or appear in this matter;
- (4) in that Defendant has yet to make an appearance in this matter, there was no party with which Plaintiff could inquire as to their consent of this application.



The requested extension will not affect any other scheduled dates, is made in good faith and not for purposes of delay and granting this extension of time will not prejudice any party to this matter.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Joshua D. Vera
Joshua D. Vera, Esq.
Counsel for Plaintiff

Cc: Counsel of Record